

**HARRIS**  
**ST. LAURENT**

July 1, 2020

**BY ECF**

Hon. Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

The two-week extension request is  
so ordered.

Alvin K. Hellerstein /s/  
July 1, 2020

Re: United States v. David Wagner, et. al., 19-cr-437 (AKH)

Dear Judge Hellerstein:

My firm represents defendant Marc Lawrence in this matter.

Pursuant to this Court's Order dated June 17, 2020 (Docket No. 68), I write to update the Court regarding Mr. Lawrence's continued efforts to search for a third financially responsible person to co-sign his personal recognizance bond.

Since our last update to the Court on June 17, 2020, both Mr. Lawrence and my office have spoken to a fourth potential co-signer. Last Friday, however, that prospect declined to co-sign Mr. Lawrence's personal recognizance bond. Mr. Lawrence has two additional prospects and plans to speak with one on Thursday and the other following the Fourth of July Holiday.

We have discussed Mr. Lawrence's efforts with the Government (AUSA Jilan Kamal and AUSA Sagar Ravi), and they have no objection to an additional two-week extension for Mr. Lawrence to continue his search. Accordingly, we ask the Court to allow Mr. Lawrence to remain at liberty with two co-signers pending the results of his continued search for another financially responsible person. We will update the Court regarding Mr. Lawrence's continued efforts no later than later than July 15<sup>th</sup>.

Respectfully,



Andrew St. Laurent

cc: AUSA Jilan Kamal, Esq. (by ECF)  
AUSA Sagar Ravi, Esq. (by ECF)